

March 31, 2003

Public Information and Records Integrity Branch (PIRIB)
EPA Office of Pesticide Programs (7502C)
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001
Attention: Docket ID Number OPP-2002-0049.

To whom it may concern,

RE: EPA "Preliminary Risk Assessment" Rodenticides.

On January 29, 2003, the US EPA published an ecological risks assessment concerning the use of rodenticides titled "Comparative Risks of Nine Rodenticides to Birds and Non-target Mammals". I am a pest management professional and have been for over 20 years and as such provide rodent pest management services to both the private and the public sectors. Not only am I a licensed and practicing pest management professional (NC, VA, WA), I have also given many training presentations at various state and professional meetings, published many articles on pest management, and am the senior author of the 811-page *NPCA Field Guide To Structural Pests*. **I am very concerned about the potential impact that these proposals can have on the availability and effective use of rodenticides for protecting food safety and public health in the future.**

In response to the "Comparative Risks of Nine Rodenticides to Birds and Non-target Mammals", I believe that EPA is required to weight both the risks and BENEFITS of public health pesticides such as rodenticides. However, the Federal Register notice announcing the availability of this document:

1. Contains no discussion of the public health benefits of rodenticide products;
2. Does not state the purpose of this document, or how it will be used by EPA;
3. Does not explain the process for public health benefits of rodenticides to be identified or considered;
4. Contains significant errors that result in erroneous and misleading "risk conclusions" and a scientifically indefensible ranking of rodenticides; and
5. Contains substantial scientific flaws and therefore, fails to meet its legal obligations under FIFRA, the APA, and the Data Quality Act.

Numerous examples of the above can be furnished if requested. EPA has even ignored the data presented in many papers that they themselves have published.

I ask EPA to insure that a complete and proper review of these rodenticides is conducted that addresses the above items. These are vital products necessary to preserve public health, as we know it, in the United States. Rodenticides provide significant public health benefits. Rats and mice, two of the many destructive disease carrying rodents controlled by these products, spread more than 35 diseases worldwide,

some of which can be fatal, e.g., Hantavirus, Rat Bite Fever, and Leptospirosis. The diseases are spread in many ways: directly through bite wounds; through contamination of human food, water, or habitation by rodent urine or feces; or by way of ticks, mites, fleas, and other biting insects that transmit the infection to humans after feeding on infected rodents. The Rodenticide Stakeholder Workgroup (RSW), a stakeholder group that EPA convened in 1999 to advise EPA on certain rodenticide issues, noted that the “societal value of rodent control is high” and the “benefits of keeping rodent infestations in check through the proper use of rodenticides or other alternative measures are many fold.”

Several major metropolitan areas, including Boston, Chicago, New York, and the District of Columbia, have recently been plagued by tremendous rodent infestations that have received national attention. Given the public health concerns presented by large-scale rodent infestations, it is even more imperative that the important role rodenticides play be considered and acknowledged in the context of the Rodenticide Comparative Preliminary Assessment.

Sincerely yours,

Eric H. Smith, PhD, BCE
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